

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC.,

Defendant.

Case No. 2:21-cv-00693-JHC

**DECLARATION OF MEREDITH
DEARBORN IN SUPPORT OF
AMAZON.COM, INC.'S UNOPPOSED
MOTION TO SEAL**

DEBORAH FRAME-WILSON, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC.,

Defendant.

Case No. 2:20-cv-00424-JHC

CHRISTOPHER BROWN, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC.,

Defendant.

Case No. 2:22-cv-00965-JHC

1 I, Meredith Dearborn, declare as follows:

2 1. I am an attorney at the law firm Dunn Isaacson Rhee LLP, counsel for Defendant
3 Amazon.com, Inc. (“Amazon”). I am licensed to practice law in the State of California and am
4 admitted to practice before this Court *pro hac vice* in this action.

5 2. I submit this declaration in support of Amazon’s Unopposed Motion to Seal
6 Materials Filed In Connection With Plaintiffs’ Motion to Compel Amazon to Produce Documents
7 and Information Responsive to Plaintiffs’ Seventh Set of Requests for Production and Fourth Set
8 of Interrogatories (“Motion to Compel”). I make this declaration based on my own personal
9 knowledge, and if called as a witness to testify, I could and would testify competently to the
10 following facts.

11 3. Attached as Exhibit A is a chart listing, for each of the Exhibits to the parties’
12 moving papers on the Motion to Compel provisionally filed under seal: (a) the document title, (b)
13 the docket numbers, and (c) Amazon’s requested approach. As shown in the chart, Amazon moves
14 to keep Exhibits 2–19, 21–27, 29, and 30 to the Motion to Compel under seal.

15 4. Attached as Exhibit B is a true and correct copy of Plaintiffs’ Motion to Compel
16 with limited redactions over a single former employee’s name. *See De Coster*, Dkt. 377.

17 5. Attached as Exhibit C is a true and correct copy of Amazon’s Opposition to the
18 Motion to Compel with no redactions. *See De Coster*, Dkt. 390.

19 6. Attached as Exhibit D is Plaintiffs’ Reply in Support of the Motion to Compel with
20 limited redactions, again over the former employee’s name. *See De Coster*, Dkt. 396.

21 7. On August 8, 2025, Plaintiffs informed Amazon that they did not oppose this
22 request. Plaintiffs had earlier challenged Amazon’s proposed additional redactions to the parties’
23 briefing papers. While it disagreed with Plaintiffs’ positions, Amazon submits this sealing request
24 in accordance with the redactions and sealing that Plaintiffs agreed not to oppose, in an effort to
25 reduce disputes before the Court.

26 I declare under penalty of perjury that the foregoing is true and correct to the best of my
27 knowledge.

1 Executed this 8th day of August 2025 in San Francisco, California.

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3 s/ Meredith Dearborn

4 Meredith Dearborn
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